

DOUGLAS R. SCHWARTZ (State Bar No. 98666)
 PETRA M. REINECKE (State Bar No. 154482)
 SCOTT R. LOVERNICK (State Bar No. 233755)
 SCHWARTZ & CERA LLP
 44 Montgomery Street, Suite 3850
 San Francisco, California 94104
 Telephone: (415) 956-2600
 Facsimile: (415) 438-2655

Attorneys for Defendant
 PENTALIS THOMAS

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CASILDA SHIPPING LTD., GENESIS
 SEATRADING CORP., and PANTELIS
 THOMAS

Defendants.

Case No. CR-08-00448 CW

**APPLICATION FOR TRAVEL ORDER
 BY DEFENDANT PANTELIS THOMAS;
 TRAVEL ORDER**

Defendant Pantelis Thomas hereby requests a court order permitting him to travel to Hemet, California from August 27, 2008 until September 15, 2008 to visit his brother and sister-in-law, Emanuel and Penny Thomas. AUSA Wade Rhyne has been made aware of this request and has no objection. In support of this Application, the undersigned declares:

1. I am an attorney at law duly licensed to practice before this Court and in all the Courts of this State, and currently practice with the law firm of Schwartz & Cera LLP, attorneys of record for defendant, Pantelis Thomas.

2. I make this declaration of my own personal knowledge and if called upon to do so, I could and would testify competently as stated herein.

3. Defendant Thomas is prohibited from traveling outside the Northern District of California by the terms of the Pretrial Release Order issued July 9, 2008.

4. Defendant Thomas requests permission to travel to Hemet, California (Riverside

County) from Wednesday, August 27, 2008 until Monday, September 15, 2008 to visit family. Mr. Thomas is restricted to the Northern District of California during the pendency of these proceedings, which will likely take many months to resolve. Mr. Thomas is a citizen of Greece. Mr. Thomas' command of the English language is minimal. He is not permitted to work, and he knows no-one here other than the few people he has met through church since being compelled by the government to disembark his vessel. Since disembarking the vessel, Mr. Thomas has remained in the Northern District, living in a small hotel room, spending his days in isolation with little connection to the outside world. I believe that permission to visit his family in the Los Angeles area would be greatly beneficial to Mr. Thomas' mental, physical and emotional well-being.

5. Mr. Thomas will not travel anywhere other than the Northern and Central Districts of California.

6. Mr. Thomas is not currently under pretrial supervision. On August 15, 2008, I spoke with AUSA Wade Rhyne regarding this Application. AUSA Rhyne has no objection to the requested travel.

7. Mr. Thomas will stay with his brother and sister-in-law at their residence located at 1373 Travis St., Hemet, CA 92543. Emanuel and Penny Thomas own and operate a fast food restaurant outside of Los Angeles. Emanuel Thomas has owned and operated a number of restaurants and has lived in California for over 35 years. Penny Thomas has lived in California for over 10 years. Counsel will provide to AUSA Rhyne a telephone number for Emanuel and Penny as soon as the Court enters an order permitting defendant Thomas to visit his family.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and executed at San Francisco, California on August 20, 2008.

Dated: August 20, 2008

Respectfully submitted.

/s/
SCOTT R. LOVERNICK
Attorney for Defendant
PANTELI THOMAS

ORDER

The Court having considered the Application For Travel Order submitted by defendant Pantelis Thomas, and good cause appearing,

IT IS HEREBY ORDERED that defendant Pantelis Thomas may travel to the Central District of California and remain there until Monday, September 15, 2008. Mr. Thomas shall reside 1373 Travis St., Hemet, CA 92543. Mr. Thomas shall check in by telephone every other day with counsel to verify his location. In the event that the government requires his presence in this district before September 15, 2008, he will return to this district promptly and at government expense.

Dated: August __, 2008

The Honorable Claudia Wilken
United States District Court e Judge